

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re TREMONT SECURITIES LAW, STATE  
LAW AND INSURANCE LITIGATION

Master Docket No. 08-Civ-11117(TPG)

YALE FISHMAN 1998 INSURANCE TRUST  
and GLENN AKIVA FISHMAN LIFE  
INSURANCE TRUST, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

GENERAL AMERICAN LIFE INSURANCE  
COMPANY, et al.,

Defendants.

Civil Action No. 11-cv-1284 (TPG)

CLASS ACTION

STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO FILE AMENDED  
COMPLAINT, MOTION TO DISMISS AND  
RELATED BRIEFING

WHEREAS, on August 19, 2011, this Court approved a partial settlement in *In re Tremont Securities Law, State Law and Insurance Litigation*, No. 08-Civ-11117 (TPG) (S.D.N.Y. 2009);

WHEREAS, on October 20, 2011, this Court held a status conference to determine how fourteen of the consolidated actions, including this consolidated action, should proceed;

WHEREAS, on November 14, 2011, the Court entered an Order, which, among other things, provided that: (i) Plaintiff shall file its amended complaint by December 19, 2011; (ii) Defendants shall respond to the amended complaint by January 31, 2012; (iii) in the event that Defendants move to dismiss the amended complaint, Plaintiff shall file its opposition by February 29, 2012; and (iv) Defendants shall file their reply brief by March 20, 2012;

WHEREAS, Plaintiff seeks a two-week extension of time to file and serve the amended complaint and to extend the schedule for the briefing on Defendants' anticipated motion to dismiss;

WHEREAS, Defendants do not oppose such request; and

WHEREAS, there have been no prior requests to extend the time for the filing of the amended complaint;

IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties, subject to the approval of the Court, as follows:

1. Plaintiff shall file its amended complaint by January 3, 2012;
2. Defendants shall file their response to the amended complaint forty five (45) days after the filing of the amended complaint;
3. Should Defendants move to dismiss the amended complaint, Plaintiff shall file its opposition to Defendants' motion to dismiss forty-five (45) days after Defendants' motion to dismiss is filed; and
4. Defendants shall file its reply brief twenty (20) days after the filing of Plaintiff's opposition.

DATED: December 15, 2011

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD  
EDWARD Y. KROUB

  
\_\_\_\_\_  
DAVID A. ROSENFELD

58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

*Attorneys for Plaintiffs*

DATED: December \_\_\_, 2011

MCCARTER & ENGLISH LLP  
THOMAS J. FINN  
PAULA CRUZ CEDILLO

\_\_\_\_\_  
THOMAS J. FINN

City Place I  
185 Asylum Street  
Hartford, CT 06103  
Telephone: 860/275-6700

*Attorneys for General American Life Insurance  
Company, GenAmerica Financial Corporation  
and Metropolitan Life Insurance Company*

DATED: December 15, 2011

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM, LLP  
SETH M. SCHWARTZ  
JASON C. VIGNA

  
\_\_\_\_\_  
SETH M. SCHWARTZ

Four Times Square  
New York, New York 10036  
Telephone: 212/735-3000

*Attorneys for Tremont Defendants*

DATED: December \_\_, 2011

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD  
EDWARD Y. KROUB

---

SAMUEL H. RUDMAN

58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

*Attorneys for Plaintiffs*

DATED: December 15, 2011

MCCARTER & ENGLISH LLP  
THOMAS J. FINN  
PAULA CRUZ CEDILLO



---

THOMAS J. FINN

City Place I  
185 Asylum Street  
Hartford, CT 06103  
Telephone: 860/275-6700

*Attorneys for General American Life Insurance  
Company, GenAmerica Financial Corporation  
and Metropolitan Life Insurance Company*

DATED: December \_\_, 2011

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM, LLP  
SETH M. SCHWARTZ  
JASON C. VIGNA

---

SETH M. SCHWARTZ

Four Times Square  
New York, New York 10036  
Telephone: 212/735-3000


*Attorneys for Tremont Defendants*

\* \* \*

**ORDER**

IT IS SO ORDERED.

DATED: 12/16/11

  
THE HONORABLE THOMAS P. GRIESA  
UNITED STATES DISTRICT JUDGE

